



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 26, 2019

Mr. Gregory Wills
Environmental Scientist
NGB/A7OR
Shepperd Hall
3501 Fetchet Avenue
Joint Base Andrews, Maryland, 20762

Re: EPA Review of "Draft Final Site Inspection Report, Air National Guard Phase II, Regional Site Inspections for Per- and Polyfluoroalkyl Substances, Tucson Air National Guard Base, Tucson, Arizona," Prepared by AECOM, Dated October 24, 2018

Dear Mr. Wills:

This letter provides the Air National Guard with the US Environmental Protection Agency's (EPA) Review of "Draft Final Site Inspection Report, Air National Guard Phase II, Regional Site Inspections for Per- and Polyfluoroalkyl Substances, Tucson Air National Guard Base, Tucson, Arizona." This document is dated October 24, 2018 and was prepared by AECOM for the Air National Guard (NGB/A4OR).

Comments are attached to this letter.

Please contact me at (415) 972-3289 if you have comments or questions. In addition, if you wish to set up a conference call to discuss, let me know.

Sincerely,

Mary T. Aycock

Mary T. Aycock
Remedial Project Manager
Air Force and DOE Section (SFD-8-1)

cc: Matthew Narter / ADEQ (email)
Mark Gardiner / APTIM (email)
Chris Perkovic / Hargis + Assoc. (email)
Mike Myers / AECOM (email)

**Review of Draft Final Site Inspection Report, Air National Guard Phase II,
Regional Site Inspections for Per- and Polyfluoroalkyl Substances,
Tucson Air National Guard Base, Tucson, Arizona (October 24, 2018)**

GENERAL COMMENTS

1. Perfluorinated compounds (PFC) were found in all media sampled, including soil, sediment, and groundwater. Project action levels were exceeded in soil and groundwater. Concentrations of total PFCs at the most downgradient well immediately south of Valencia Road were 1,040 parts per trillion (ppt) (MW103U). Concentrations to the east at MW03-U also along the downgradient northern edge of the Base were 4,880 ppt total PFCs. These data indicate that offsite migration to the northwest is occurring. EPA recommends that an expanded investigation be completed to fully characterize the nature and extent of contamination on Base, as well as off Base to the north. The investigation should include additional horizontal as well as vertical characterization. Additional investigation should also include the sampling of any private and water supply wells downgradient of the Base.
2. PFCs were found in groundwater at the most upgradient wells along the southeastern boundary of the Base at 118 ppt (MW96U) and 161 ppt (MW97U). The Air National Guard may benefit from further research into possible upgradient sources potentially on Airport Property and further upstream in Airport Wash. Potential sources may include areas that the ANG used for fire training on Airport Property.
3. EPA agrees with the recommendations presented in Section 7.2 of the report. Based on the results presented in the report, EPA agrees that further investigation at all 14 potential release locations sampled during the SI is necessary to determine the nature and extent of PFC contamination.